

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

In re:)	
)	
SHERONTA JOHNSON,)	Case No. 14-30682
)	
Debtor.)	Chapter 13
)	

OBJECTION TO APPLICATION FOR COMPENSATION

Comes now Debtor, SHERONTA JOHNSON, by and through her attorney of record, J.D. Graham, and for her Response states as follows:

1. That Debtor commenced her Chapter 13 bankruptcy on April 25, 2014.
2. That the attorney of record at the time of filing was William A. Muller.
3. That on September 29, 2014 Attorney J.D. Graham filed his notice of Substitution of Counsel.
4. That on October 8, 2014 William A. Muller filed an Application for Compensation requesting approval for legal fees in the amount of \$2,302.50.
5. That on October 16, 2014 the Trustee filed his response to the Application for Compensation providing that he had no objection to the amount requested by Debtor's former counsel; however he seeks to limit the amount to be paid to J.D. Graham to \$1,697.50.
6. That the following services were provided by Debtor's former attorney;
 - April 25, 2014 – Filed petition, plan and schedules.
 - May 2, 2014 – Filed amended schedule F.
 - May 6, 2014 – Filed another amended schedule F.
 - May 29, 2014 – Appeared to request continuance of the 341 meeting of creditors.
7. That the following services have been provided by attorney J.D. Graham;
 - September 29, 2014 – Filed Notice of Substitution of Counsel.

- October 14, 2014 – resolved the pending Motion to Dismiss. Prepared agreed order and submitted to Court for entry.
 - October 21, 2014 – prepared and filed Amended Plan #1, collected and reviewed pay documentation, prepared and filed Amended schedule I, and filed Notice of Adjourned Section 341 Meeting of Creditors.
 - October 24, 2014 – reviewed Trustee's objection to Amended plan #1.
 - Meeting of Creditors is scheduled for November 19, 2014 and J.D. Graham will be attending.
8. That Debtor's prior attorney provided representation for a period of five months, the 341 meeting of creditors has not yet occurred, and the plan has not been confirmed.
 9. That attorney J.D. Graham will attend the 341 meeting of creditors, resolve any objections raised by the Trustee and or Creditors, and provide representation for the remaining 55 months of the plan.
 10. That limiting attorney J.D. Graham to only \$1,697.50 in legal compensation is unreasonable given the above stated facts.
 11. That Debtor was made aware that William Mueller would be entitled to compensation for work performed.
 12. That Debtor was made aware that J. D. Graham would accept representation of the Debtor for the cost of \$4,000 because of the length of time remaining in her case and anticipated amount of work to be performed in her case for the next four and half years.
 13. That Debtor agreed to the terms of this representation.
 14. That J.D. Graham should be allowed attorney fee's in the amount of \$4,000.00.

RESPECTFULLY SUBMITTED,

By: /s/ J.D. Graham
J.D. Graham, #06211732
J.D. GRAHAM, P.C.
1103 Frontage Rd.
O'Fallon, IL 62269
618-235-9800
618-235-9805 fax
jd@jdgrahamlaw.com

Proof of Service

The undersigned hereby certifies that a copy of the foregoing Objection to Application for Compensation was served upon the persons listed below by first class mail, postage prepaid this 29th day of October 2014 to those who were not served electronically.

/s/Tim Martie

Russell C. Simon
Chapter 13 Trustee
24 Bronze Pointe
Swansea, IL 62226

U.S. Trustee
Becker Building, Ste. 1100
401 Main St.
Peoria, IL 61602

All creditors on mailing matrix